

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
	:	
v.	:	DATED: _____
	:	
JERMAINE DEMETRIUS ANDERSON	:	VIOLATIONS:
	:	18 U.S.C. § 1028(a)(7) (identity theft -
	:	2 counts)
	:	18 U.S.C. § 2 (aiding and abetting)
	:	Notice of additional factors

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about September 11, 2001, in the Eastern District of Pennsylvania and elsewhere,
defendant

JERMAINE DEMETRIUS ANDERSON

knowingly and without lawful authority, used a means of identification of another person with intent to commit and to aid and abet, a violation of federal law, that is, false use of a social security number for the purpose of obtaining anything of value, in violation of 42 U.S.C. § 408(a) (7) (B), by fraudulently using the name, social security number and date of birth of a person, identified here by the initials T.B., on a credit application that was provided to Ford Motor Credit Company, and ultimately to Winner-Lincoln-Mercury, 6723-27 Essington Avenue, Philadelphia, Pennsylvania, to obtain anything of value aggregating more than \$1,000, that is, a Lincoln Navigator automobile valued at approximately \$48,000, in a one-year period and thereby affected interstate commerce.

In violation of Title 18, United States Code, Sections 1028 (a) (7), (b)(1)(D), (c)(3)(A) and 2.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

From on or about September 21, 2001, to on or about September 27, 2001, in the Eastern District of Pennsylvania and elsewhere, defendant

JERMAINE DEMETRIUS ANDERSON

knowingly and without lawful authority, used a means of identification of another person with intent to commit and to aid and abet, a violation of federal law, that is, false use of a social security number for the purpose of obtaining anything of value, in violation of 42 U.S.C. § 408(a) (7) (B), by fraudulently using the name, social security number and date of birth of a person, identified here by the initials T.B., on a credit application that was provided to Pacifico Mazda, 6715 Essington Avenue, Philadelphia, Pennsylvania, to obtain anything of value aggregating more than \$1,000, that is, a Mazda Millennia automobile valued at approximately \$32,185, in a one-year period and thereby affected interstate commerce.

In violation of Title 18, United States Code, Sections 1028 (a) (7), (b)(1)(D), (c)(3)(A) and 2.

NOTICE OF ADDITIONAL FACTORS

THE GRAND JURY FURTHER CHARGES THAT:

1. In committing the offenses charged in Counts One and Two of this indictment, defendant

JERMAINE DEMETRIUS ANDERSON

a. committed offenses in which the intended loss exceeded \$70,000, as described in U.S.S.G. § 2B1.1(b)(1)(E).

2. In committing the offense charged in Count Two of this indictment, defendant

JERMAINE DEMETRIUS ANDERSON

a. recklessly created a substantial risk of death and serious bodily injury to another person in the course of fleeing from a law enforcement officer, as described in U.S.S.G. § 3C1.2.

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
UNITED STATES ATTORNEY